



Maryland Department of Budget & Management

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Office of Information Technology
Telecommunications Access of Maryland

PARRIS N. GLENDENING
Governor

KATHLEEN KENNEDY TOWNSEND
Lieutenant Governor

T. ELOISE FOSTER
Secretary

THOMAS K. LEE
Deputy Secretary

December 17, 2002

Ms. Jenifer Simpson
Consumer Inquiries & Complaints Division
Consumer & Governmental Affairs Bureau
FCC
445 Twelfth Street, S.W.
Washington, DC 20554

Reference: FCC No. 02-N83298, Mr. Al Sonnenstrahl

Dear Ms. Simpson:

Thank you for allowing Maryland Relay to respond to the complaint registered with the FCC by Mr. Alfred Sonnenstrahl.

In your letter to Maryland Relay regarding this complaint, you stated that, *“Mr. Sonnenstrahl makes a specific allegation involving the federal mandatory minimum requirements for operational standards for communications assistants (CAs). See § 64.604 (a)(1).”*

His allegation involves the wpm typing speed requirement for CAs to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.”

Mr. Sonnenstrahl's email to the FCC stated, *“I called 800-735-2258 (Maryland Relay) to make a toll-free call today, Monday, October 28, 2002 at about 8:30 pm, from 301-770-7555. CA1284 handled the call. This CA's typing speed appears to be much slower than required 60 wpm.”*

It will be greatly appreciated if you could investigate and improve the Center's typing speed.”

The operator in question tested at a wpm rate of over 60 WPM according to the response we received from AT&T and thus met the minimum typing requirement as set forth by the FCC. Mr. Sonnenstrahl



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also mentioned that he would like the FCC to investigate and improve the Center's typing speed. According to the reports from AT&T, the average typing at the center is 63.4 WPM.

Which again, exceeds the FCC minimum typing speed of 60 wpm. We realize that this average typing speed is lower than Maryland users had in the past with the provider that served our State for over 11 years. However, all 130 operators at the Maryland Center are new. The RFP evaluation committee (made up of Maryland Relay Users) realized that, with an entire pool of new operators, it would require time to hire, train, and attain typing speeds realized by the previous provider. It was the decision of the evaluation team that access to more functionally equivalent capabilities, such as passing information directly to 9-1-1 emergency centers, outweighed the temporary slower typing speeds.

Every effort is being made to bring the pool of new operators up to previous Maryland performance levels. These efforts include, but are not limited to, practice computers and software in a separate training area and monetary reward for increased performance.

Please share this complaint and Maryland Relay's resolution/comments with the appropriate policy personnel at the FCC.

If you have any additional questions, please do not hesitate to call me at 410-767-5891(V/TTY) or 1-800-552-7724 (V/TTY).

Sincerely,

Brenda Kelly-Frey, Director
MD Relay

Cc: Mr. Al Sonnenstrahl
Missy Devlin, AT&T
Pam Stewart, DBM/TAM